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September 22, 2017

**VIA ELECTRONIC FILING (ECF)**

Hon. Leda D. Wettre, U.S.M.J.  
United States District Court, District of New Jersey  
M. L. King, Jr. Federal Courthouse  
50 Walnut Street, MLK2A  
Newark, New Jersey 07102

Re: *David W. Noble v. Samsung Electronics America, Inc.*,  
– Civil Action No. 2:15-03713-MCA-LDW

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Dear Magistrate Judge Wettre:

We write jointly on behalf of both parties in the above-referenced action and in furtherance of the parties' respective letters (Dkt. Nos. 40 and 42) to the Court regarding discovery in this matter.

Counsel for both parties conducted a meet-and-confer conference call regarding discovery issues on September 20, 2017 and are working cooperatively at developing a joint discovery plan in this matter. To the extent the parties require further assistance or intervention by the Court on discovery issues, the parties will promptly inform the Court.

The parties also respectfully request the scheduling of a Rule 16 preliminary conference in this matter at the Court's convenience. Counsel for the parties are available for such a conference on October 20, 23, and 24, 2017, should those dates be convenient for the Court.

Respectfully submitted,

/s/ S. Gale Dick  
S. Gale Dick  
(admitted *pro hac vice*)

cc: All Counsel of Record (via email)